

# EXHIBIT A

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIAN  
SANTIAGO, and SUSAN LYNN  
HARVEY, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688-RS

**DECLARATION OF SUSAN HARVEY**

Judge: Hon. Richard Seeborg

Date:

Time:

Location:

DECLARATION OF SUSAN HARVEY

3:20-cv-04688-RS

1 I, Susan Harvey, declare as follows.

2 1. My name is Susan Harvey. I am over eighteen years of age and am competent to  
3 testify to and have personal knowledge of the facts set forth herein.

4 2. I am a plaintiff in this lawsuit against Google, LLC ("Google") and was appointed  
5 a class representative. Dkt. 352.

6 3. I was deposed in this lawsuit on October 27, 2022.

7 4. During that deposition, because my anxiety levels were raised, I had to take  
8 frequent breaks to reduce my anxiety and continue with the deposition.

9 5. My anxiety levels remained high after my deposition. Six days after my  
10 deposition, I suffered a stroke. This first stroke caused temporary paralysis to the left half of my  
11 body, and I was rushed to the hospital via ambulance.

12 6. While I was still in the hospital, two days after the first stroke, I suffered a second  
13 stroke. This second stroke again caused temporary paralysis to the left half of my body.

14 7. I was told by my doctor that the stress of the deposition contributed to these  
15 strokes.

16 8. Around Christmas of 2022 (two months after my deposition) I suffered a third  
17 stroke. This third stroke caused temporary paralysis to my entire body.

18 9. Since my first (and subsequent) strokes, I have been treated to reduce the  
19 likelihood of further strokes and restore my health. I see my doctors on approximately a monthly  
20 basis, and they continue to monitor and treat those medical conditions with multiple medications.

21 10. My doctors have not cleared me to testify at trial due to my medical conditions  
22 and have told me to avoid stress whenever possible.

23 11. Based upon my medical history, conditions and how I currently feel, I do not  
24 believe I can safely testify in this case.

25 12. Google sent a process server to my personal residence at approximately 9:00 P.M.  
26 and served me with a trial subpoena commanding me to return to San Francisco on August 19,  
27 2025 for trial. This experience caused me additional anxiety and distress.

14. Throughout this whole interaction I was very anxious and stressed out. After the process server left, I immediately called my lawyers. I reiterated that I cannot testify in this case because of my health conditions.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 17th day of August, 2025, at Chowchilla, California.

Susan Lynn Harvey